



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

December 15, 1997

RE: DOE FEMP  
OSDF LINER CERTIFICATION  
REPORT

Mr. Johnny Reising  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed DOE's letter "On-site Disposal Facility Liner Certification Report" submitted on November 5, 1997. In the letter DOE proposes to place waste into the OSDF prior to completion of the Construction Quality Control Report, which is required by the Impacted Materials Placement Plan. Ohio EPA concurs that, for Cell 1 of the OSDF, impacted materials (only that amount required to attain winter cover) can be placed prior to completion of the CQC Report. However, it will not be acceptable to place impacted material into the OSDF prior to completion of construction activities covered by the CQC Report. According to OSDF CQA Plan, the CQC report would include Cell 1 and the leachate transmission system construction. Plan Ohio EPA expects that both DOE and Geosyntec will provide verbal confirmation to Ohio EPA that construction is complete prior to placement of any impacted material. Additionally, if the CQC Report has not been submitted and the facility, including the leachate transmission is not operational, within 2 weeks of initiation of impacted material placement, then impacted material placement must halt.

Approval to initiate waste placement prior to completion and submittal of the CQC Report does not mean the facility construction is acceptable. If upon review of the CQC Report it is found the facility was not acceptably constructed, DOE will be required to remove any impacted material necessary to properly complete construction.

This approval for impacted material placement is limited to soils from the East Soil Stockpile in an amount not to exceed that required for winter cover. No additional impacted material may be placed in the OSDF prior to completion and approval of the CQC report and the Waste Acceptance Criteria Attainment Plan.

Ohio EPA strongly disagrees with DOE's suggestion that waste placement in future cells may also need to occur prior to CQC Report approval by the EPAs. We emphasize that our approval is

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limited to the East Stockpile placement in Cell 1 only and we provide fair warning that future requests of this nature will not be favorably entertained. Ohio EPA is confident that by implementing lessons learned and careful planning, DOE and FDF will not find it necessary to seek future exemptions of a similar nature.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,



Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
Terry Hagen, FDF  
Ruth Vandergrift, ODH  
Mark Shupe, HSI GeoTrans  
Francie Barker, Tetra Tech EM Inc.  
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